

IN THE UNITED STATES DISTRICT COURT,
FOR THE DISTRICT OF NEW JERSERY

IN RE VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

BRIAN LOVELAND,

v.

ZHEJIANG HUAHAI PHARMACEUTICAL
CO., LTD., HUAHAI U.S. INC., SOLCO
HEALTHCARE U.S., LLC,
AMERISOURCEBERGEN CORPORATION,
WALGREENS BOOTS ALLIANCE,
PRINSTON PHARMACEUTICAL INC.,
TORRENT PHARMA, INC., TORREN
PHARMACEUTICALS, LTD., AND JOHN
DOE.

MDL No. 2875

Master Docket Case No. 1:19-md-2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Joel Schneider,
Magistrate Judge

**MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT**

Civil Action No. 1:22-cv-04357

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

The Plaintiff, by and through her undersigned counsel, moves this Honorable Court to allow the Plaintiff to file the attached First Amended Short-Form Complaint, pursuant to Federal Rule of Civil Procedure 15. In support, the Plaintiff states the following:

1. Plaintiff, Brian Loveland, filed his Short-Form Complaint on June 30, 2022.
2. Plaintiff's original Short-Form Complaint was filed against only the following Defendants because of missing National Drug Codes: Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S. Inc., Solco Healthcare U.S., LLC, AmerisourceBergen Corporation, Walgreens Boots Alliance, Prinston Pharmaceutical Inc., Torrent Pharma, Inc., Torren Pharmaceuticals, Ltd., and John Doe.
3. Plaintiff seeks to amend his Short-Form Complaint to add the following Defendants: Camber Pharmaceuticals, Inc., Hetero Drugs, Ltd., Hetero Labs, Ltd., Hetero USA, Inc., Vivimed Life Sciences Pvt. Ltd., Heritage Pharmaceuticals, Inc. d/b/a Avet

Pharmaceuticals, H J Harkins Co., Inc. dba PharmaPac, Wal-Mart, Inc., and McKesson Corporation.

4. Plaintiff reached out to relevant Defense Counsel to attempt to meet and confer about this filing.
5. Allowing Plaintiff to file the Amended Short-Form Complaint would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.
6. A Copy of the Proposed Amended Short-Form Complaint is attached as Exhibit A.
7. A Copy of the Proposed Order is attached as Exhibit B.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court grant his Motion for Leave to File Amended Complaint.

Respectfully Submitted,

/s/ Tessa Cuneo
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